

DECLARATION OF LUKE WOOLMAN IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT

The undersigned, Luke Woolman, hereby states and declares as follows:

1. I am a citizen and resident of the State of Kentucky, County of Campbell.

2. I am currently a second-year law student at the University of Cincinnati College of Law. I also am in the United States Army Reserves, with the rank of Second Lieutenant.

3. The facts set forth in this Declaration are not intended to be an exhaustive recitation of all of the relevant facts known to me, but are rather intended to relate some of the specific information of which I have personal knowledge.

4. Last summer, I worked as an intern with the United States Department of Justice, Criminal Division, Capital Case Section in Washington D.C. I started my summer internship on May 16, 2017.

5. I attended a happy hour on May 24, 2017 at the Proper 21 Restaurant and Bar in Washington D.C. Also present were Capital Case Section Chief Kevin Carwile, Capital Case Section Deputy Chief Gwynn X. Kinsey, and other attorneys from the Capital Case Section.

6. During the evening, both Mr. Carwile and Mr. Kinsey drank heavily. Mr. Kinsey, who is a married man, began to take what seemed very clearly to be unwelcome liberties of a physical, sexual nature with a Capital Case Section staffer, who, to preserve her privacy, I will refer to only as A.T.

7. Mr. Kinsey repeatedly touched A.T. inappropriately, openly and obviously, in the presence of Proper 21 patrons, as well as Mr. Carwile and at least one Capital Case Section attorney who was still present and seated nearby. Mr. Carwile did not chide, warn or request that Mr. Kinsey desist in any way, although, as stated, what was occurring was obvious and inappropriate.

8. Instead, at the end of the evening, Mr. Carwile approached me and asked me not to discuss anything that I witnessed. I initially laughed because I presumed Mr. Carwile was joking, but then he sternly reiterated his request, specifically stating that he was being serious.

9. Investigations were conducted regarding this incident, and I was interviewed by James Mann, Chief of Staff to then-Assistant Attorney General Leslie Caldwell. During the course of my interview with Mr. Mann, another person was on the telephone listening. I was also interviewed by investigators from the Department of Justice, Office of the Inspector General.

10. If called as a witness, I could truthfully and competently testify to the foregoing based on my personal knowledge.

Sworn under penalty of perjury this 21st day of December 2017
in the State of Texas.

/s/ Luke Woolman
Luke Woolman